

Remarks

This is in response to the non-final Office Action mailed March 27, 2008. Claims 9-11 are canceled without prejudice or disclaimer. Independent claims 1, 12, and 20 are amended, support for the amendments being found, for example, at paragraphs 0286-0291 of the present application. Claims 1-4, 6-15, 17-23, and 25-27 remain pending. Withdrawal of the pending rejections and advancement of this application to allowance are requested for at least the following reasons.

I. Claim Rejections - 35 U.S.C. § 102

Claims 1, 3, 4, 6, 9, 10, 12, 14, 15, 17, 20, 22, 23, and 25 are rejected under 35 U.S.C. § 102(e) as being anticipated by Hurley et al. (U.S. Patent No. 6,678,882 B1; hereinafter "Hurley"). This rejection is respectfully traversed, and reconsideration is requested for the following reasons.

Claim 1 is directed to a method for synchronizing multiple instances of a storage platform for a hardware/software interface system. Claim 1 recites, in part, sequentially enumerating changes and tracking said changes on a per change unit basis, wherein a change unit is mapped to a community folder with which each of the plurality of instances synchronizes, each of the plurality of instances storing a mapping of the change unit from a local format to a format of the community folder, the mapping enabling synchronization of the change unit with the community folder. It can be advantageous to use community folders so that multiple instances can stay synchronized without having to necessarily represent data in the same manner. See ¶¶ 0287-0290 of the present application. Hurley fails to disclose or suggest a community folder as recited by claim 1.

Claim 1 also recites, for synchronization, identifying new changes by comparing the enumerated changes for a particular instance with the state of changes for that instance. Hurley fails to disclose identifying new changes by comparing the enumerated changes for a particular instance with the state of changes for that instance. The Action identifies column 4, line 45 through column 5, line 14 of Hurley as disclosing the noted limitation. However, at this section, Hurley simply discloses a collaboration model including abstractions describing various functional requirements. See Hurley, col. 4, ll. 46-52. These functional requirements include

“synchronization of work results to achieve system (enterprise) goals” and “propagation of changes and unresolved conflicts synchronization that is automated...” Hurley, col. 5, ll. 3-11.

None of these elements suggests the specific synchronization step recited in claim 1, namely identifying new changes by comparing the enumerated changes for a particular instance with the state of changes for that instance. At best, this section of Hurley discloses high-level goals for synchronization, but fails to suggest the specific synchronization operations of claim 1.

Reconsideration and allowance of claim 1, as well as claims 3-4 and 6 that depend therefrom, are therefore requested.

Claims 12 and 20, although not identical in scope to claim 1, includes limitations similar to those noted above with respect to claim 1. Claims 12 and 20 should therefore be allowable for at least similar reasons to those provided above with respect to claim 1. Reconsideration and allowance of claims 12 and 20, as well as claims 14-15, 17, 22-23, and 25, that depend therefrom respectively, are therefore requested.

II. Claim Rejections - 35 U.S.C. § 103

Claims 2, 13 and 21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Hurley in view of Kawamichi et al. (U.S. Patent No. 7,181,470 B1). Claims 7-8, 18-19, and 26-27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Hurley in view of Ooe et al. (U.S. Patent No. 5,737,743 A; hereinafter “Ooe”). Finally, claim 11 is rejected under 35 U.S.C. 103(a) as being unpatentable over Hurley in view of Noel et al. (U.S. Patent No. 6,381,682 B2; hereinafter “Noel”). These rejections are respectfully traversed, and reconsideration is requested for the following reasons.

As discussed above, independent claims 1, 12 and 20 are patentable. Claims 2, 7-8, 13, 18-19, 21 and 26-27 depend (directly or indirectly) from one of the independent claims 1, 12 and 20. Claims 2, 7-8, 11, 13, 18-19, 21 and 26-27 are therefore patentable for at least the same reasons as those provided above for claims 1, 12 and 20. Namely, Hurley fails to teach all of the elements of the claims, e.g., a community folder, neither Ooe nor Noel, alone or in combination, compensates for the deficiency in Hurley. The correctness of the rejections is not conceded. Reconsideration and allowance of claims 2, 7-8, 13, 18-19, 21 and 26-27 are therefore respectfully requested.

III. Conclusion

The remarks set forth above provide certain arguments in support of the patentability of the pending claims. There may be other reasons that the pending claims are patentably distinct over the cited references, and the right to raise any such other reasons or arguments in the future is expressly reserved.

Favorable reconsideration in the form of a Notice of Allowance is respectfully requested. Please contact the undersigned attorney with any questions regarding this application. Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account 13-2725.

Respectfully submitted,

MERCHANT & GOULD P.C.

P.O. Box 2903

Minneapolis, Minnesota 55402-0903

(612) 332-5300

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/Robert A. Kalinsky/

Name: Robert A. Kalinsky

Reg. No.: 50,471